

### REMARKS

The office action dated June 13, 2007 has been carefully considered and applicant respectfully traverses the rejections that have been made based upon Booth, applied singularly or in combination with Muller or Findlader.

The examiner has now rejected independent claims 1 and 13 under 35 U.S.C. 102(b) as being anticipated by Booth, stating that Booth discloses an apparatus and a method for interfacing a media access controller (MAC) and a physical layer device (PHY) for operating as either a gigabit media independent interface or a 10-bit interface. Applicant respectfully traverses this rejection and disputes that Booth does in fact disclose a physical layer device for operating as either a gigabit media independent interface and a 10-bit interface. Moreover, it does not disclose a multiplexer for mapping data and control signals that are normally applied to a predetermined number of pins to a lesser number of pins.

Booth has no discussion whatsoever regarding a reduced number of pins. It is not believed to even be mentioned in the entire specification and particularly in the sections specifically identified in Section 3, page 2 of the office action. More fundamentally, claim 1 is directed to an apparatus which has a physical layer device for operating as either a gigabit media independent interface or a 10-bit interface. Booth simply does not have *a* device that operates as either a gigabit media independent interface or a 10-bit interface. Column 12, lines 18-45 of the Booth specification describes Fig. 5 in detail and it clearly has *two* devices, one of which is a SERDES device 430 that operates as a 10-bit interface and another different G/MII device 440 which operates as a gigabit media independent interface. The circuitry includes a link switch 420 which can switch between the devices 430 and 440.

Since they are different devices and since they are not concerned with mapping data and control signals that are normally applied to a predetermined number of pins to a lesser number of pins, it is believed that Booth totally fails to anticipate, teach or suggest claim 1.

Claim 13 is also directed to a method of interfacing a media access controller (MAC) and a physical layer device (PHY) for operating either as a gigabit media independent interface and a 10-bit interface and transfer data at a predetermined

rate while substantially reducing the required number of input and output pins. Booth therefore also totally fails to anticipate, teach or suggest this claim for the same reasons as have been set forth above with regard to claim 1.

Claim 8 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Booth in view of Findlater. Applicant respectfully traverses this rejection for the reason that Booth totally fails to teach or suggest a media interface as claimed which includes a physical layer device for operating as at least a gigabit media independent interface and a 10-bit interface as discussed above and Findlater fails to supply this basic deficiency. Moreover, claim 8 states “said interface multiplexing the data and control signals that are applied to a reduced number of pins using both edges of said clock signal and for selectively mapping the data and control signals to a reduced number of pins, wherein CRS and COL control signals are applied on a single pin.”

The examiner has conveniently ignored the final recitation “wherein CRS and COL control signals are applied on a single pin”. Even assuming for the sake of argument that Findlater teaches the pin count reduction by combining control signals on the single pin, it certainly does not teach combining CRS and COL control signals on a single pin. In fact, FIG. 2 clearly shows the CRS and COL signals are applied on separate lines 218 and 220. For these reasons, it is believed that neither Booth nor Findlater, applied singularly or in combination with one another, teach or suggest this claim.

The dependent claims should also be allowed because they incorporate the subject matter of the independent claims from which they depend and in addition claim other features and/or functionality not found in those claims.

For the foregoing reasons, reconsideration and allowance of all pending claims is respectfully requested. If this amendment raises any further issues that warrant discussion, it is requested that the examiner call the undersigned at the examiner's early convenience.

Respectfully submitted,

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